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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

PACIFIC GAS AND ELECTRIC COMPANY,

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

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Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**DECLARATION OF CHRISTINA F.
PULLO IN SUPPORT OF DEBTORS'
OMNIBUS RESPONSE TO
MOTIONS TO ENLARGE TIME TO
FILE RESCISSION OR DAMAGE
CLAIM PROOF OF CLAIM FORMS**

1 I, Christina F. Pullo, pursuant to section 1746 of title 28 of the United States Code, hereby
2 declare under penalty of perjury that the following is true and correct to the best of my knowledge,
3 information, and belief:

4 1. I am Vice President of the Global Corporate Actions Department of Prime Clerk LLC
5 (“**Prime Clerk**”), the court-appointed claims and noticing agent and administrative advisor for PG&E
6 Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”, and together with
7 PG&E Corp., the “**Debtors**”) in the above-captioned cases (the “**Chapter 11 Cases**”). I submit this
8 declaration in support of the *Debtors’ Omnibus Response to Motions to Enlarge Time to File Rescission*
9 *or Damages Proofs of Claim* [Dkt No. 6934] (the “**Response**”). I am authorized to submit this
10 declaration.

11 2. The matters stated herein are based upon my personal knowledge and review of relevant
12 documents. If called upon, I would testify to the facts set forth in this declaration.

13 3. On March 2, 2020, Prime Clerk LLC (“**Prime Clerk**”), on behalf of the Debtors, mailed
14 (i) a Rescission or Damage Claim Proof of Claim Form,¹ and (ii) the Rescission or Damage Claim Bar
15 Date Notice (collectively, the “**Rescission or Damage Claim Bar Date Materials**”) to the 75,089
16 parties identified by EQ Shareowner Services as registered holders of the Equity Securities during the
17 Putative Class Period.

18 4. On February 28, 2020, Prime Clerk, on behalf of the Debtors, served the Rescission or
19 Damage Claim Bar Date Materials on approximately 795 banks, brokers, and financial institutions (or
20 their agents) (collectively, the “**Nominees**”)² that might have purchased the Debt or Equity Securities
21 in “street name” on behalf of the underlying beneficial owners of those Debt or Equity Securities during
22 the Putative Class Period.

23 5. In addition to the Rescission or Damage Claim Bar Date Notice, which has a specific
24 section addressed to Nominees regarding the applicable noticing requirements and deadlines, Prime
25

26 ¹ Capitalized terms not defined herein shall have the meanings ascribed to them in the Response.

27 ² These approximately 795 Nominees were served at approximately 1,095 different addresses. In
28 addition, included in the list of Nominees are the clearinghouses through which the Nominees hold
securities, such as The Depository Trust Company, Euroclear, and Clearstream (among others).

1 Clerk also included in its February 28, 2020 mailing of the Rescission or Damage Bar Date Materials
2 to the Nominees a cover letter that restated the detailed instructions regarding the Court-ordered
3 requirements and deadlines as they pertained to the Nominees. A copy of this letter is attached as
4 Exhibit 1 hereto.

5 6. During the period beginning February 28, 2020 and ending on April 2, 2020, Prime
6 Clerk received requests from Nominees to send approximately 160,000 printed copies of the Rescission
7 or Damage Claim Bar Date Materials, either to various beneficial owners identified by such Nominees,
8 or directly to the Nominees for the Nominees to distribute to their beneficial owners. These mailings
9 to Nominees and beneficial owners, as applicable, were completed by Prime Clerk typically within two
10 to five days of receiving the required information from the respective Nominee, and Prime Clerk in no
11 instance took longer than one week to complete any such mailing.

12 7. Between the dates of April 3, 2020 and April 15, 2020, Prime Clerk received requests
13 from three (3) additional Nominees (the “**Late Nominees**”) requesting mailings of approximately
14 110,000 additional printed copies of the Rescission or Damage Claim Bar Date Materials, either
15 directly to their beneficial holders or to the Late Nominee, as designated by the Late Nominee. Prime
16 Clerk promptly completed each of the Late Nominees’ requested mailings.

17 8. Prime Clerk, at the Debtors’ direction, has accepted for processing and is continuing to
18 accept for processing Rescission or Damage Claim Proof of Claim Forms notwithstanding the passage
19 of the Extended Securities Claims Bar Date, and individuals who have contacted Prime Clerk or the
20 Debtors have been advised that they may still file Rescission or Damage Claim Proof of Claim Forms,
21 but that the Debtors reserve their rights with respect thereto.

22 Pursuant to 28 U.S.C. § 1746, I declare under the penalty of perjury, that the foregoing is true
23 and correct to the best of my knowledge, information, and belief.

24 Dated: April 24, 2020

25 /s/ Christina F. Pullo

26 Christina F. Pullo